

Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

In the Matter of	)	
	)	
Connect America Fund	)	WC Docket No. 10-90
	)	
High-Cost Universal Service Support	)	WC Docket No. 05-337

**REPLY COMMENTS OF ALASKA COMMUNICATIONS SYSTEMS GROUP, INC.**

**I. INTRODUCTION AND SUMMARY**

Alaska Communications Systems Group, Inc., on behalf of its operating subsidiaries (“ACS”),<sup>1</sup> submits these reply comments in support of certain comments that have been filed in response to the request of the Wireline Competition Bureau (the “Bureau”) in the above-captioned dockets for comments on data specifications for documenting incumbent local exchange carrier (“ILEC”) study area boundaries for use in universal service funding.<sup>2</sup> ACS agrees with those who observe that the Bureau’s proposal to require “all incumbent LECs to submit study area maps in esri compatible formats”<sup>3</sup> will be unreasonably burdensome on smaller companies. ACS continues to encourage the Bureau to consider alternative and less burdensome proposals that will

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<sup>1</sup> In this proceeding, Alaska Communications Systems Group, Inc. represents four local exchange carrier subsidiaries, ACS of Alaska, Inc., ACS of Anchorage, Inc., ACS of Fairbanks, Inc., and ACS of the Northland, Inc. (the “ACS ILECs”), as well as ACS Long Distance, Inc., ACS Internet, Inc., ACS Cable, Inc., and ACS Wireless, Inc. (“ACS Wireless”). Together, these companies provide wireline and wireless telecommunications, information, broadband, and other network services to residential, small business and enterprise customers in the State of Alaska and beyond, on a retail and wholesale basis, using ACS’s statewide and interstate facilities.

<sup>2</sup> *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, Public Notice, WC Dockets 10-90 & 05-337, DA 12-868 (Wireline Competition Bur. rel. June 1, 2012) (the “*SA Boundaries Public Notice*”).

<sup>3</sup> *SA Boundaries Public Notice*, ¶ 7.

enable the Commission to obtain the information it needs to implement nationwide mapping in order to accomplish the many of the goals set forth in the *USF/ICC Transformation Order*,<sup>4</sup> specifically its efforts to address study area boundary overlaps.<sup>5</sup>

## II. DISCUSSION

ACS agrees with comments filed by the industry associations,<sup>6</sup> specifically cautioning the Commission to “be mindful of significant disparities in available resources among ILECs” with regard to preparation of shapefiles for study area boundary mapping.<sup>7</sup> As detailed in its initial comments in this proceeding, ACS would have difficulty complying with the Bureau’s proposed study area data collection. ACS relies on a very small regulatory staff with limited ability to produce the shapefiles that the Commission seeks. In addition, the unique geography and lack of population density in many parts of Alaska would make the process even more burdensome than it might be in other areas of the nation. As noted in its comments, many ACS study areas encompass vast expanses of land and bodies of water, much of which is unpopulated.<sup>8</sup> Requiring ACS to submit mapping data for these vast unpopulated areas would necessitate physical surveys of these outlying areas, which as pointed out in the Industry Association

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<sup>4</sup> *Connect America Fund, et al.*, Report & Order and Further Notice of Proposed Rulemaking, WC Dockets 10-90 *et al.*, 26 FCC Rcd 17663, 17728 (2011) (“*USF/ICC Transformation Order*”), *Pet. for Rev. pending, In re: FCC 11-161*, Case No. 11-9900 (10<sup>th</sup> Cir., filed Dec. 8, 2011).

<sup>5</sup> See *SA Boundaries Public Notice*, ¶ 7 (proposing process “to resolve any overlap issues”) and ¶ 8 (seeking comment on process for state commissions “to resolve overlap claims”).

<sup>6</sup> Comments of the National Exchange Carrier Association, Inc., Independent Telephone and Telecommunications Alliance, National Telecommunications Cooperative Association, Organization for the Promotion and Advancement of Small Telecommunications Companies, United States Telecom Association, Eastern Rural Telecom Association, and the Western Telecom Alliance, Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 (filed July 2, 2012) (“Industry Association Comments”).

<sup>7</sup> Industry Association Comments at 3.

<sup>8</sup> Comments of Alaska Communications Systems Group, Inc., Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 at 5 (filed July 2, 2012) (“ACS Comments”).

Comments would be a “very time-consuming, expensive and potentially dangerous process.”<sup>9</sup>

Further, there is simply no compelling regulatory justification to require such extensive mapping in Alaska.<sup>10</sup> In addition to the time, expense, and risk required to complete physical surveys necessary to support the mapping effort, the results would be of little value to the Commission. In many cases, Alaskan study area boundaries simply are not, and do not need to be, drawn with the level of exactitude that may be necessary or prevalent in other areas of the Lower 48 States. Carriers serving Alaska are physically separated, not just from the Lower 48 States but also, in many cases, from each other.<sup>11</sup>

For this reason, ACS suggests, as an alternative to the proposed rule, that Alaska ILECs be required only to submit maps of their current customer locations, not the vast areas in their study areas without any inhabitants or even in some cases any land or inhabitable land.<sup>12</sup> Such a solution could meet the Commission’s needs while substantially reducing the burden on Alaska carriers. Alaska’s geography and population density is sufficiently different from that found in the Lower 48 States, there is no need to impose mapping methods in Alaska that are identical to those the Commission adopts for the rest of the nation.<sup>13</sup>

At a minimum, the Bureau should consider suspension of any mapping requirements for Alaska until the CAF II modeling effort has been completed because it may find that the mapping information ACS has already submitted for CAF II modeling by study area density, square mileage, and road miles is all the Bureau needs to complete

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<sup>9</sup> Industry Association Comments at 3-4.

<sup>10</sup> See ACS Comments at 5.

<sup>11</sup> See ACS Comments at 2, 5, and 6.

<sup>12</sup> See ACS Comments at 6.

<sup>13</sup> See ACS Comments at 6.

the Alaska portion of its nationwide mapping effort.<sup>14</sup> The full-scale mapping effort proposed by the Commission might produce little or no useful information in Alaska, as explained above and in ACS’s initial comments.<sup>15</sup> The proposed mapping effort does not appear to be necessary to provide information that is essential to the Commission’s CAF II modeling effort, and less burdensome alternatives for resolving study area boundaries are available using existing information. Every effort should be made to avoid diverting precious company resources to such an effort at this time.

Alaska is not like any state in the contiguous Lower 48 States and the carriers that serve this unique state should not be made to comply with standards that will simply waste their resources without producing any benefit to them or to the Commission. A unique solution is appropriate and necessary for a unique state and the challenges faced by the carriers that serve it.

ACS also agrees with the Industry Association Comments urging the Commission to “incorporate significant flexibility in designing processes to collect study area boundary information from ILECs” and to “make clear that such submissions should reflect ‘best efforts’ in establishing boundary data, and certification requirements (if any) should be phrased accordingly.”<sup>16</sup> As discussed above, ACS and other small companies have limited resources and are being asked by the Commission to do more with them, such as deploying broadband. Better study area maps are a good goal, but perfect study boundary knowledge is not essential to the Commission’s programs, at least not in Alaska.

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<sup>14</sup> See ACS Comments at 7.

<sup>15</sup> See ACS Comments at 6. See also Industry Association Comments at 3-5.

<sup>16</sup> Industry Association Comments at 4.

The Bureau has invited flexibility into the study area boundary data gathering process, specifically by seeking “comment on a voluntary process for state commissions to resolve overlap claims or otherwise assist carriers in their states in submitting boundaries for all carriers in the state.”<sup>17</sup> ACS agrees with other commenters that, whatever mapping process the Commission adopts, the involvement of the state commissions is essential. Not only do the state commissions have primary responsibility for defining and managing ILEC study areas, but, as the Bureau recognizes, “[s]tate involvement could substantially reduce the burden to both the industry and the Commission.”<sup>18</sup> Any tool that improves efficiency and reduces the burden of this project on small companies is worth employing.

### **III. CONCLUSION**

For foregoing reasons, ACS continues to oppose a uniform mapping requirement that fails to account for the unique challenges of serving Alaska. ACS urges the Bureau to adopt an Alaska-specific alternative as a reasonable means of achieving the Commission’s mapping goals, and to permit state involvement where it saves resources. Lest “the best be the enemy of the good,” the Bureau should ensure that any mapping requirements it adopts are reasonably designed to achieve their intended purpose, and not unduly burdensome on any sector.

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<sup>17</sup> *SA Boundaries Public Notice*, ¶ 8.

<sup>18</sup> *See id.* Numerous comments support state involvement to lessen the burdens on carriers as well as to produce consistent and accurate study area maps. *See, e.g.,* Comments of Alexicon Telecommunications Consulting, Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 at 4 (filed July 2, 2012); Comments of the Nebraska Public Service Commission, Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 at 2 (filed July 2, 2012); Comments of the Oregon Telecommunications Association, Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 at 1 (filed July 2, 2012); and Comments of the Nebraska Rural Independent Companies, Public Notice, *Comment Sought On Data Specifications for Collecting Study Area Boundaries*, WC Dockets 10-90 and 05-337, DA 12-868 at 4 (filed July 2, 2012).

Respectfully submitted,

Leonard A. Steinberg  
General Counsel and Corporate Secretary  
ALASKA COMMUNICATIONS SYSTEMS  
GROUP, INC.  
600 Telephone Avenue  
Anchorage, Alaska 99503  
907-297-3000

/s/  
Karen Brinkmann  
Robin Tuttle  
KAREN BRINKMANN PLLC  
555 Eleventh Street, NW  
Mail Station 07  
Washington, D.C. 20004-1304  
202-365-0325  
[KB@KarenBrinkmann.com](mailto:KB@KarenBrinkmann.com)

*Counsel for ACS*

July 17, 2012